

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BAIDU, INC. and BEIJING BAIDU NETCOM
SCIENCE & TECHNOLOGY CO., LTD.,

Plaintiffs,

v.

REGISTER.COM, INC.

Defendant.

ECF CASE

Civil Action No. 10 CV 444(DC)

DECLARATION OF CAREY R. RAMOS

CAREY R. RAMOS declares:

1. I am a member of the law firm Paul, Weiss, Rifkind, Wharton & Garrison LLP, attorneys for Plaintiffs Baidu.com, Inc. and Beijing Baidu Netcom Science and Technology Co., Ltd. (together, "Baidu") in the above-captioned action. I submit this Declaration in opposition to Defendant Register.com's motion to dismiss Baidu's complaint.


2. In its brief in support of its motion to dismiss, Defendant asserts that the code that Defendant sent to the Imposter was "similar but not identical" to the code sent back by the Imposter to Defendant. (Def. Br. at 6.)

3. According to a security incident report prepared by Defendant and sent to Baidu to memorialize the January 11, 2010, breach of security, the security code sent by Defendant to Baidu was "81336134," and the security code sent thereafter by the Imposter to Defendant was "96879818."

4. Annexed hereto as Exhibits A and B are true and accurate copies of the webpage to which the Imposter re-routed Baidu's users on January 11, 2010. Exhibit A shows just the content of the Imposter's web page. Exhibit B includes the full screen frame showing how the Imposter's web page appeared on a computer screen – with the address “http://baidu.com” in the address bar of the web browser.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 8, 2010.



Carey R. Ramos

EXHIBIT A

IRANIAN CYBER ARMY

THIS SITE HAS BEEN HACKED BY IRANIAN CYBER ARMY

(The page contains faint, illegible markings or bleed-through from the reverse side.)

...: Contact ...

Alternate Email: Soldier@IRCArmy.com

EXHIBIT B

THIS SITE HAS BEEN HACKED BY IRANIAN CYBER ARMY

از روش ساینبرگ افراد در انجمن‌های به دنبال طای ساینبرگ بینگه و ضمیمه‌یستون در امور داخلی کنسول وای و بخش اخبار دروغ و سرور براکینگر راه اندازی شده است.



Perrin, C. W.

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